<u>Chemours Company – Fayetteville Works</u> <u>EPA ID # NCD 047 368 642</u> Facility Exit Summary

Facility Name and Location

Chemours Company (DuPont Fayetteville Works until 2015) Fayetteville Works 22828 NC Highway 87 West Fayetteville, NC 28306-7332 EPA ID # NCD 047 368 642

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Facility Background

The Chemours facility is located in Duart Township, Bladen County, North Carolina. The entrance to the facility is 15 miles south of the City of Fayetteville, North Carolina on NC Highway 87. While the manufacturing complex is located in Bladen County, approximately 20 percent of the facility's total property lies in Cumberland County, North Carolina. The site consists of approximately 230 acres of developed property enclosed by fencing. Of this total, twenty-three acres is leased to Kuraray Americas, Inc. and an additional 31 acres is leased to E. I. duPont de Nemours. Undeveloped property at the facility, approximately 1,970 acres, is owned by Chemours.

The first manufacturing area at the Chemours facility was constructed in 1970. The Chemours plant currently consists of two main manufacturing areas – the Nafion® Area and the PPA Area. The Nafion® Area manufactures fluorocarbon membrane for electronic cells and fluorocarbon intermediates for the production of the fluorocarbon membrane. The PPA Area manufactures polymer processing aids (PPAs).

Kuraray Americas, Inc. owns two manufacturing units at the site. The former SentryGlas® Plus unit produces a structural interlayer for architectural safety glass, and the Butacite® Area manufactures polyvinyl butyral sheeting and polyvinyl butyral resin for automotive and architectural safety glass. The polyvinyl fluoride (PFV) manufacturing unit is owned by DuPont Corporation. Polyvinyl fluoride (PVF) is used to produce Tedlar® film.

Regulatory History

Chemours initially received a RCRA permit to operate a hazardous waste container storage area and tank systems in February 1983. The facility submitted an amended Part A permit application in 1991 that documented upgrades to the fluorocarbon waste treatment and tank system. A RCRA Part B operating permit issued in 1997 limited the storage capacity of the RCRA container storage area (SWMU 1) to 71,750 gallons and permitted nine hazardous waste tanks. In 2012, DuPont (now Chemours) was issued a renewal RCRA Hazardous Waste Management Permit.

Regulated Units and Hazardous Waste Management

Under the 2012 RCRA permit, Chemours managed hazardous wastes in one container storage area and four waste tanks. Hazardous wastes generated from various chemical manufacturing processes include: waste fluorocarbon, neutralized waste fluorocarbon, waste DMSO, waste sulfuric acid, spent molecular sieves, waste hydrocarbon, flush water, waste toluene with high moisture, waste polymer solvent, waste polymer adhesions with water, fluorocarbon reactor tails, surfactant process distillation heels, polymer processing waste and spent filters.

The container storage area is a reinforced concrete pad surrounded by a chain link fence, covered by a roof and designed to provide 7,801 gallons of secondary containment. The maximum storage capacity is 70,400 gallons, which is equivalent to 1,280 55-gallon drums. Containers vary in size from 30-gallon drums up to 330-gallon totes.

The VES Waste Fluorocarbon Storage Tank is an 86-gallon tank provided with 213 gallons of secondary containment. The Waste Fluorocarbon Storage Tank is a 1,100 gallon tank provided with 13,305 gallons of secondary containment. The Waste Fluorocarbon Reactor is a similar 1,100 gallon tank, also provided with 13,305 gallons of secondary containment. The Waste DMSO Storage Tank is a 6,000 gallon tank provided with 21,663 gallons of secondary containment.

Status of Corrective Action

In 1996, Chemours conducted a RCRA Facility Assessment (RFA) and identified Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that required environmental investigations. In accordance with the recommendations in the RFA and permit conditions in the draft permit, Chemours completed several phases of Confirmatory Sampling (CS) and RCRA Facility Investigations (RFIs). In addition, DuPont investigated potential APFO (C-8) releases as part of RFI activities and reported that the

groundwater in the immediate vicinity of the PPA Area had been impacted at concentrations exceeding the Interim Maximum Allowable Concentration (IMAC) for this constituent (2 ppb).

The 2012 RCRA permit identified sixty-four SWMUs and nine AOCs at the Chemours facility. As part of the Phase III RFI (also known as the Final RFI), Chemours conducted environmental investigations at nine of these units. Recent releases and recently identified releases were investigated concurrently with approved Phase III RFI activities (see "Phase III RFI-Stage 1 Results – Technical Memorandum" (2012). The Phase III RFI report was reviewed and approved in late 2014. The current RCRA permit also states that a Corrective Measures Study (CMS) is necessary for SWMU 6-Process Sewer System. (Volatile organic compounds, semi-volatile organic compounds, fluoride, and metals have been detected in groundwater samples collected downgradient from SWMU 6.)

Ongoing and Near-Term Corrective Action Activities

In order to determine whether select PFCs are migrating off-site, Chemours will sample five groundwater monitoring wells located along the northern and eastern boundaries of the facility. Chemours also has reported additional recent releases that should be addressed. The outcomes of these two tasks should determine whether the RFI is complete, and the facility can move into the CMS. Chemours wishes to pursue a risk-based cleanup for the site.

Chemours recently asked whether SWMUs 9A, 9B, and 9C could receive river sediment from SWMU 21A-South Settling Basin. The HWS is currently developing a response to this inquiry. Chemours anticipates that clean-out of Settling Basin will begin in about two years. During a meeting on August 30, 2016 with Chemours representatives they made several proposals/requests on a range of issues at the facility. They will submit a formal letter to DEQ in early 2017 that will highlight these issues that they wish to address. A Corrective Measures Study Work Plan was submitted in late 2016 for DEQ review and approval for SWMUs 6, SWMU 7 and the site-wide groundwater area of concern (AOC GW).